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ABSTRACT

Twenty outbreaks of foodborne illness in schools were reported to the Centers for Disease Control and Prevention (CDC) during 1997; however, only 8 cases were associated with food served in the school meal programs. Preliminary findings identified nine outbreaks in 1998, affecting an estimated 1,609 individuals. CDC notes that such outbreaks are underreported for a variety of reasons. The report recommends that the Secretary of Agriculture expeditiously develop a database for continuously documenting all food safety actions taken on foods donated to the Department's food assistance programs, and also provide additional information to help schools develop food procurement contracts that further ensure food safety. An appendix contains a comment from the U.S. Department of Agriculture to the U.S. General Accounting Office. GAO comments supplementing those in the report text appear at the end of the appendix. (DFR)

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United States General Accounting Office

GAO

Report to the Ranking Minority Member, Committee on Agriculture, Nutrition, and Forestry, U.S. Senate

February 2000

SCHOOL MEAL PROGRAMS

Few Outbreaks of Foodborne Illness Reported

ED 440 450

EA 030 361

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Abbreviations

CDC	Centers for Disease Control and Prevention
FNS	Food and Nutrition Service
HACCP	Hazard Analysis and Critical Control Point
USDA	U.S. Department of Agriculture

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United States General Accounting Office
Washington, D.C. 20548

Resources, Community, and
Economic Development Division

B-284297

February 22, 2000

The Honorable Tom Harkin
Ranking Minority Member
Committee on Agriculture,
Nutrition, and Forestry
United States Senate

Dear Senator Harkin:

The safety of food served in schools is a matter of concern because of children's vulnerability to foodborne illness. More than 33 million meals are served daily to children through two federally assisted meal programs administered by the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS)—the National School Lunch and School Breakfast programs. In fiscal year 1998, the two programs cost a total of about $7.1 billion for cash reimbursements to schools, USDA-donated foods, and program administration. Local school food authorities purchase about 83 percent of the food served in the lunch program and all of the food served in the breakfast program. Food donated by USDA—such as beef, poultry, fruit, vegetable, grain, and dairy products—make up the remainder of the food served in the lunch program. USDA's Agricultural Marketing Service and Farm Service Agency acquire the donated foods by contracting with various suppliers; FNS' Food Distribution Division distributes the foods to state agencies; and the state agencies distribute the foods to schools.

To obtain information on the safety of foods served in the National School Lunch and School Breakfast programs, you asked us to determine the extent (1) of foodborne illness outbreaks related to meals served in schools; (2) to which USDA-donated foods in schools were removed, replaced, or disposed of because of the potential to cause foodborne illness; and (3) to which USDA has established procurement policies and procedures for ensuring the safety of foods it donates to the programs.

Results in Brief

Twenty outbreaks of foodborne illness in schools were reported to the Centers for Disease Control and Prevention during calendar year 1997, the most recent year for which national data were available.[1] However, the health department records of the states that reported these outbreaks and other documentation indicate that only 8 of the 20 outbreaks were associated with food served in the school meal programs. The other 12 outbreaks were related to foods that were consumed in schools but that were brought from home or obtained from other sources. Nationwide data were not available for 1998; however, the health department records of the states that reported outbreaks in schools to the Centers for Disease Control and Prevention in 1997 identified nine outbreaks associated with food served in school meal programs during 1998. These outbreaks in 1997 and 1998 affected an estimated 1,609 individuals.

We identified five instances during the last 5 years in which USDA, in collaboration with others, removed, replaced, or disposed of USDA-donated foods because of the potential for the foods to cause foodborne illness. Two of the five actions were associated with the foodborne illness outbreaks involving USDA-donated foods during 1997 or 1998. The five actions involved approximately 1.7 million pounds of strawberries, 556,000 pounds of beef patties, 400,000 pounds of poultry, 25,000 pounds of beef-and-vegetable protein patties, and an unknown quantity of ground beef. However, these five actions may not represent all the food safety actions taken because USDA lacks a process to systematically identify and document such actions. A multiagency food distribution reengineering team has proposed that FNS' Food Distribution Division establish a database to continuously track all food safety actions taken on donated foods.

USDA has established procurement policies and procedures that are intended to help ensure the safety of foods donated to schools. USDA's provisions for the safety of donated foods are contained in procurement contracts used to purchase the foods from various suppliers. Some of these contract provisions are based on the same food safety regulations that are intended to protect food sold to the general public. For example, the

[1]The Centers for Disease Control and Prevention (CDC), an agency of the Department of Health and Human Services, is responsible for monitoring and investigating outbreaks of foodborne disease. CDC defines an outbreak as foodborne illness from a common source affecting two or more individuals. CDC notes that such outbreaks are underreported for a variety of reasons.

contracts require suppliers to ensure that plants processing USDA-donated foods are operated and inspected in accordance with national food safety laws. Additionally, for certain foods with special safety concerns, such as eggs and diced chicken, USDA contracts require more stringent safety testing than is required by law for food sold to the general public. Finally, USDA contracts require that donated food be maintained at appropriate temperatures during processing, storage, and transportation. In addition to specific contract provisions, USDA officials told us that they consider potential suppliers' food safety compliance records before awarding contracts. However, the food safety provisions in USDA's procurement policies and procedures do not apply to schools, which purchase 83 percent of the food served in the school lunch program and all of the food for the breakfast program. Furthermore, USDA provides schools with limited guidance on procuring safe foods. Therefore, the extent to which school food procurement contracts address safety may vary, depending on state and local laws and the procurement guidance that is available to schools.

This report recommends that the Secretary of Agriculture (1) expeditiously develop a database for continuously documenting all food safety actions taken on foods donated to the Department's food assistance programs and (2) provide information to assist schools in developing food procurement contracts that further ensure food safety.

Background

The goals of both the National School Lunch and School Breakfast programs are to improve children's nutrition, increase lower-income children's access to nutritious meals, and help support the agricultural economy. The school lunch program is available in almost all public schools and in many private schools. About 70 percent of those schools also participate in the breakfast program. FNS' Child Nutrition Division administers both school meal programs.

Schools that participate in the school lunch or breakfast programs receive a per-meal federal cash reimbursement for all meals they serve to children, as long as the meals meet federal nutrition standards. For 1998, the combined cash reimbursements for the two programs totaled about $6.3 billion. In addition, schools participating in the lunch program are entitled to USDA-donated foods, at a value of 14.75 cents per meal served, which amounted to $643 million in fiscal year 1998. Overall, USDA provides about 17 percent of the dollar value of food that goes on the table in school lunch programs. Schools purchase the remaining 83 percent of food served using

USDA's cash reimbursement and their own funds. With 1998 federal administrative costs totaling about $100 million, the total cost in fiscal year 1998 of the national lunch and breakfast programs—cash reimbursements, donated food purchases, and administration—was about $7.1 billion.

USDA's Agricultural Marketing Service and Farm Service Agency are responsible for procuring USDA-donated foods. The Agricultural Marketing Service purchases meat, poultry, fish, and fruits and vegetables for donation, while the Farm Service Agency purchases grains, oils, peanut products, dairy products, and other foods. USDA contracts for the purchase of these products with suppliers who are selected through a formally advertised competitive bidding process. FNS' Food Distribution Division administers the Food Distribution Program, which provides the donated foods to state agencies for distribution to schools and other eligible local outlets.

While no federal agency specifically monitors the safety of school meals, USDA's Food Safety and Inspection Service and the U.S. Department of Health and Human Services' Food and Drug Administration are responsible for enforcing regulations that ensure the safety of the nation's food supply. The Food Safety and Inspection Service is responsible for the safety of meat, poultry, and some eggs and egg products, while the Food and Drug Administration is responsible for all other foods, including fish, fruit, vegetable, milk, and grain products. When unsafe foods are detected, neither agency has the authority to recall them from distribution, but the appropriate agency can request manufacturers to do so voluntarily.[2] Additionally, each agency announces recalls to keep the public informed. However, the announcements do not include detailed information, such as whether the recalled food was delivered to a USDA food assistance program or was USDA-donated food.

[2]The Food Safety and Inspection Service also has the authority to temporarily detain potentially contaminated products for up to 20 days while it seeks a court order for seizure. The Food and Drug Administration may seize adulterated products, but such action generally requires a court order.

Few Outbreaks of Foodborne Illness Are Linked to Schools

For 1997, the most recent year for which nationwide data were available, 20 outbreaks of foodborne illness in schools were reported to the Centers for Disease Control and Prevention (CDC).[3] According to CDC's documentation and the health department records from the 10 states that reported outbreaks to CDC's database, only 8 of the 20 outbreaks were actually associated with food served in the school meal programs. The other 12 outbreaks were not linked to foods served in the school meal programs but with foods brought to schools from home or other sources. Among the eight outbreaks associated with school meals, USDA-donated strawberries were the suspected source for four, while the other four were not linked to USDA-donated foods. The 1997 outbreaks associated with the school meal programs affected an estimated 688 individuals.

For 1998, nationwide data on outbreaks of foodborne illness in schools were not available from CDC. However, the health department records from the 10 states reporting outbreaks of foodborne illness in schools to CDC in 1997 showed nine additional outbreaks associated with food served in the school meal programs during 1998. USDA-donated ground beef and potato rounds served in school meals were the suspected sources for two outbreaks, while the other seven were not linked to USDA-donated foods. The 1998 outbreaks associated with the school meal programs affected an estimated 921 individuals.

USDA Records of Actions to Prevent the Consumption of Potentially Unsafe USDA-Donated Foods in Schools Are Incomplete

We identified five instances during the last 5 years in which USDA, in collaboration with others, took actions to remove, replace, or dispose of USDA-donated foods that had the potential to cause foodborne illness. Two of these actions—involving strawberries and ground beef—were associated with five of the outbreaks of foodborne illness involving USDA-donated foods that were reported in schools during 1997 or 1998.

- In April 1997, the Food and Drug Administration announced the recall of about 1.7 million pounds of frozen strawberries purchased by USDA for the school lunch program. The supplier initiated the recall after the

[3]According to CDC, foodborne illnesses are underreported because (1) milder cases are often undetected; (2) pathogens that are transmitted through food may also be spread through water or from person to person, obscuring the role of foodborne transmission; and (3) some proportion of foodborne illness is caused by pathogens or agents that have not yet been identified and thus cannot be diagnosed. Furthermore, CDC relies on states to voluntarily report outbreak information.

product was determined to be associated with a March 1997 outbreak of infectious hepatitis A among schoolchildren in Michigan. The strawberries were subsequently associated with outbreaks in schools in Arizona, Maine, and Wisconsin, and affected 254 individuals in the four states.

- In May 1997, the Food Safety and Inspection Service and the Food and Drug Administration participated in an investigation of dioxin-contaminated products after the Environmental Protection Agency detected elevated levels of dioxin in poultry. USDA had purchased some potentially tainted poultry for donation to the school lunch program. The agencies subsequently determined that the levels of dioxin detected did not warrant a recall; however, as a precautionary measure, USDA requested that the supplier stop distributing the product to schools. The supplier replaced about 400,000 pounds of potentially tainted poultry; no illnesses in schools were identified.
- In May 1998, the Food Safety and Inspection Service announced the recall of beef-and-vegetable protein patties, of which about 25,000 pounds had been donated by USDA to the school lunch programs in North Carolina and Georgia. A single illness prompted testing of the product. After testing showed the presence of E. coli O157:H7, USDA recovered and replaced the tainted product.
- In September 1998, a meat processor recalled over 2 million pounds of products contaminated with salmonella, of which approximately 556,000 pounds were beef patties destined for the school lunch program. The processor picked up and replaced all of the tainted products in 11 states. No illnesses in schools were associated with the tainted meat.
- In October 1998, USDA-donated ground beef was suspected in an outbreak of E. coli O157:H7 that infected 11 school children in Washington State. However, when the Food Safety and Inspection Service and the state tested samples of the meat that was the suspected source, they found no contamination. Most of the meat suspected in the outbreak had already been consumed, and no other illnesses had been reported; USDA took no further action.

We cannot be certain that these five incidents represent all of the safety actions taken for USDA-donated foods suspected of contamination. USDA lacks comprehensive documentation of safety actions taken for donated food because the Food Distribution Division's Food Hold and Recall Coordinator did not start to record such actions until October 1998. As a result, we had to rely on USDA procurement officials to identify some of the actions mentioned above. USDA is considering establishing a database to continuously track all safety actions associated with USDA-donated

foods, as recommended in the final report of a USDA-led multiagency team charged with reengineering the process for handling potentially unsafe foods. According to the current Food Hold and Recall Coordinator, the database would include all safety-related actions from October 1998 forward. However, USDA has not yet approved the reengineering proposals; therefore, it is not certain that actions will be taken to develop this food safety database.

USDA Contracts Contain Provisions Intended to Ensure Safety, but USDA Provides Little Guidance to Help Schools Procure Safe Food

USDA has established procurement policies and procedures intended to ensure the safety of the food it donates to schools. However, the agency provides limited guidance to help ensure the safety of foods procured by school food authorities, who purchase 83 percent of the food served in the school lunch program and all of the food served in the school breakfast program.

USDA Has Established Policies and Procedures Intended to Ensure the Safety of Foods Purchased for Donation to Schools

USDA procurement officials rely on many of the same food safety regulations that are intended to protect food sold to the general public to help ensure the safety of foods they purchase to donate to schools. For example, USDA's contract provisions require plants that process USDA-donated foods to be operated under and inspected in accordance with applicable federal food safety laws and regulations. Specifically, USDA's contracts require meat suppliers to adhere to the Federal Meat Inspection Act and poultry suppliers to the Poultry Products Inspection Act. Under these laws, suppliers must adhere to the Food Safety and Inspection Service's regulations, including a requirement that meat and poultry plants operate Hazard Analysis and Critical Control Point (HACCP) systems.[4] The Service's inspectors monitor these plants daily. In November 1999, a Food Safety and Inspection Service enforcement action against a beef processor

[4]HACCP systems are designed to actively monitor and control contamination throughout the food production process by identifying places where the greatest food safety risks exist, implementing methods to control the risks at those points, and then monitoring the efficacy of the controls.

that was not complying with HACCP standards prompted USDA to terminate its school food contracts with the processor the following day.

Foods not subject to daily USDA inspection—such as dairy products and processed fruits and vegetables, including juices—must be produced in plants that operate under the Federal Food, Drug and Cosmetic Act. These products are subject to periodic inspections by the Food and Drug Administration to ensure that they are produced in accordance with its regulations on good manufacturing practices. According to USDA officials, annual plant surveys, which cover good manufacturing practices, among other things, are required of all successful bidders of processed fruit and vegetable products. In addition, USDA contracts require that USDA graders inspect most finished products to ensure compliance with contract specifications. While the graders are not specifically monitoring safety issues, they are in a position to identify evidence of potential food safety problems, such as swollen cans or discolored meat.

USDA's procurement contracts also address safety concerns associated with certain foods by including provisions that specify more stringent testing than is required by the Food Safety and Inspection Service or the Food and Drug Administration. For example, the Agricultural Marketing Service's contracts for diced chicken specify pathogen testing for every lot because this product is highly susceptible to contamination. Procurement contracts for egg products specify that every lot of eggs be tested after pasteurization to ensure that they have not been recontaminated with salmonella. After contamination occurred several years ago, USDA specified that peanut products, such as peanut butter, be tested for arsenic. While the problem has not recurred, USDA has retained the specification to ensure the product's safety.

Finally, USDA's procurement contracts have provisions that are intended to ensure that suppliers maintain USDA-donated food products at appropriate temperatures during processing, storage, and transportation. For example, USDA's contracts establish standards for suppliers that indicate how quickly frozen meat and poultry products must reach zero degrees Fahrenheit for safe storage. Other contract specifications establish specific temperature requirements for chilled and frozen products during processing and storage at the plant, transportation between processing plants, upon shipment from the plant, and upon arrival at the final destination. According to USDA procurement officials, the trucks or railcars used to transport meat or poultry products and frozen or chilled fruit and vegetable products from the plant to their final destination must

have refrigeration units capable of maintaining the required temperatures for delivery.

Besides including contract provisions that are intended to address food safety, USDA takes steps to address safety before contracting. USDA procurement officials said they consider the potential suppliers' records for compliance with food safety regulations in their reviews of bids before contracting. The officials said that through their continual contact with a relatively small pool of potential suppliers, contacts with various agency inspectors and graders, and knowledge of the industry, they are aware of a potential supplier's record of compliance with food safety regulations and take this record into account when determining whether this potential supplier is responsible.

Furthermore, because of quality concerns, the Farm Service Agency has developed a precontracting procedure for a few of the foods that it purchases, such as peanut butter, that indirectly helps to ensure foods' safety. The agency formally rates suppliers' food quality and safety programs before allowing them to bid on a contract. Bidding companies are required to establish food safety controls, which USDA reviewers assess for specific criteria in several categories, such as the use of good manufacturing practices, appropriate inspection and testing of products, and appropriate storage and handling procedures. Suppliers are ineligible to bid if they fail to achieve the minimum score established by agency contracting officials. Agency officials anticipate that over the next 5 years this procedure will become effective for all foods purchased by the Farm Service Agency for USDA's food assistance programs.

USDA Provides Little Guidance to Promote Safety in School Food Procurements

While USDA has established procurement policies and procedures that are intended to ensure the safety of foods donated to schools, these policies and procedures do not apply to foods purchased by local schools, which account for 83 percent of the food served in the school lunch program and all of the food served in the school breakfast program. According to USDA's regulations for schools participating in the school meal programs, the responsible "school food authority may use its own procurement procedures which reflect applicable State and local laws and regulations," provided that the procedures comply with applicable federal standards for economy and efficiency in contracting, including free competition and access to contractors' records.[5] Therefore, the extent to which schools address safety in their food procurement contracts may vary, depending on state and local laws and procurement guidance that is available to them.

Although USDA provides general guidance to school food authorities on food procurement, this guidance is not specific or complete with regard to ensuring the safety of purchased food. For example, some procurement guidance appears in USDA's food safety technical assistance publication, *Serving It Safe: A Manager's Tool Kit*, which was published and distributed to all school food authorities in 1996 and updated in 1999. This tool kit is one of USDA's major efforts to provide school food service personnel with guidance on safe food handling practices. However, the discussion of purchasing in the tool kit is limited and provides only general information. For example, it suggests that school officials "put food safety standards in your purchase specification agreement" but offers no examples or guidance on appropriate standards or specifications. The guidance states "suppliers must meet federal and state health standards" but does not identify these standards or attempt to explain what they might entail.

USDA has distributed two guidance manuals on food purchasing to all school food authorities and conducts procurement-related training. In 1995, USDA distributed *First Choice: A Purchasing Systems Manual for School Food Service*, which provides a step-by-step overview of the procurement process for schools. In 1996, USDA distributed *Choice Plus: A Reference Guide for Foods and Ingredients* as complementary guidance to *First Choice*, explaining how to describe specific foods in developing purchase specifications, along with purchasing tips for each food. While these manuals discuss in detail the development of product descriptions

[5]A school food authority is responsible for the administration of the program in one or more schools.

and contract specifications that ensure food quality and nutrition, neither one specifically addresses the topic of ensuring the safety of food in procurement, with one exception—the *First Choice* manual directly addresses safety in the procurement of pre-cut fresh produce. Without recommending contract provisions to ensure the safety of such produce, the manual suggests visiting the vendor's plant before contracting and suggests evaluating key areas, such as processing procedures and food safety measures. However, the manual contains no specific guidance for ensuring safety in the procurement of other types of food, such as meat, poultry, and dairy products or processed fruits, vegetables, and juices.

Information is readily available from USDA that, if made available to school food authorities, could help ensure the safety of foods that they procure. Such information appears in (1) USDA's contract specifications for inspecting, storing, and transporting donated food products, as well as for addressing special safety concerns presented by certain foods and (2) the Farm Service Agency's methodology for formally examining the quality and safety practices of suppliers before accepting their bids. In addition, the Agricultural Marketing Service's Food Quality Assurance staff, which has provided presentations to some school food service professionals on procurement practices that promote the safety of purchased food, has developed a list of about 140 "commercial item descriptions," which specify the prominent characteristics of each product. While USDA's *First Choice* manual refers to these descriptions as a source of information about food products, the descriptions also include useful information on other topics, such as microbiological testing and other safety-related standards, as well as the sources for governmental and nongovernmental standards and other guidance documentation.

Although USDA has provided little guidance to help schools ensure the safety of the foods they procure for the school meal programs, it is currently participating in a group that provides a potential mechanism for disseminating such guidance. USDA officials are participating in the CDC-initiated National School Food Safety Working Group, which is composed of government agencies, industry, and other interested groups to assist the nation's schools in preventing foodborne illness. The group meets bimonthly to share information about school food safety, disseminate relevant information, explore opportunities for interagency collaboration and coordination, and conduct strategic planning toward reducing foodborne illness in schools. Formed in mid-1999, the group is gathering information and identifying issues to address. Furthermore, according to FNS officials, the need for additional educational materials and

information on safety-related procurement practices will be discussed when the National Food Service Management Institute, under a cooperative agreement with FNS, convenes an advisory group of school lunch program professionals in January 2000.

Conclusions

Few outbreaks of foodborne illness have been reported in connection with USDA's school meal programs. Furthermore, USDA may have prevented or mitigated such outbreaks by collaborating with others to remove, replace, or dispose of USDA-donated foods that posed possible safety concerns. However, the full extent of these actions is unknown because USDA has not maintained comprehensive records of the actions it has taken to address possible safety concerns associated with donated food. Without such records, USDA lacks a reliable basis for identifying safety trends and for documenting the agency's responsiveness to concerns over the safety of USDA-donated foods.

USDA has established procurement policies and procedures that are intended to ensure the safety of foods it purchases and donates to school meal programs. However, most of the food served in these programs is purchased by schools. Despite the volume of food that schools purchase, USDA has provided little guidance on procurement practices that could help ensure the safety of these purchases. As a result, schools lack a valuable source of information that could bolster the safety of food served in school meal programs. USDA could use existing communication channels to provide such guidance at minimal expense.

Recommendations to the Secretary of Agriculture

To better ensure that donated food safety actions are documented and that school contract provisions help ensure the safety of foods purchased for the school lunch and school breakfast programs, we recommend that the Secretary of Agriculture direct the Administrator of the Food and Nutrition Service to

- expeditiously develop the proposed Food Distribution Division's food safety action database and
- provide information to state or local authorities on safety provisions that could be included in school food procurement contracts.

Agency Comments

We provided USDA with a copy of this report for review and comment. USDA generally concurred with the accuracy of the information presented in the report. However, USDA was concerned that the report did not address its efforts and resources devoted to providing school food service personnel with guidance on safe food handling practices. USDA said it considers food handling and preparation to be the most significant areas affecting the safety of food served to schoolchildren because foods purchased by schools, like food purchased by the general public, are already protected by federal, state, and local food safety regulations. We agree that such food handling practices are important in ensuring the safety of school meals. However, evaluating this particular aspect of USDA's food safety activities was beyond the scope of the work we had been requested to conduct. Accordingly, we did not highlight a discussion of these activities in the report.

In commenting on the draft report's recommendations, USDA agreed to take action on the recommendation to provide schools with information on safety provisions that could be included in school food procurement contracts. In response to a USDA concern regarding the implementation of this recommendation, we clarified the final recommendation to give the agency more flexibility in implementing it. USDA did not address our recommendation to expeditiously implement the Food Distribution Division's proposed database for food safety action in its written comments. However, the director of this division advised us that the agency concurred with the recommendation and stated that USDA would develop the database.

USDA provided a number of technical comments, which we incorporated into the report as appropriate. USDA's comments and our responses are included as appendix I.

Scope and Methodology

To determine the extent of foodborne illness in schools that participate in the school meal programs, we obtained the CDC's state-reported nationwide information on outbreaks of foodborne illnesses for schools for calendar year 1997, the most recent year for which data were available, and reviewed CDC's published outbreak investigation reports. We contacted state health department officials and obtained information regarding the outbreaks reported to CDC for 1997, as well as for 1998 school outbreaks in the state. We used the state health department information to determine whether the illness at the school was associated with a meal prepared and

served at the school. We contacted the school where the outbreak occurred to determine whether the meal was served as part of the National School Lunch or School Breakfast programs. If necessary, we contacted the county health department where the outbreak occurred for additional information.

To determine the extent to which USDA-donated foods in schools were removed, replaced, or disposed of because of the potential to cause foodborne illness, we interviewed USDA procurement officials of the Agricultural Marketing Service and the Farm Service Agency. We also interviewed FNS' Food Distribution Division Food Hold and Recall Coordinator and reviewed documentation of safety-related actions.

To determine USDA's procurement policies and procedures for ensuring the safety of foods served in the programs, we examined and discussed relevant regulations, policies, and procedures with USDA officials and reviewed selected USDA procurement contracts. We also examined the USDA procurement guidance provided to states and school districts.

We conducted our work from July 1999 through December 1999 in accordance with generally accepted government auditing standards.

As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report for 30 days. At that time, copies of this report will be sent to the Honorable Dan Glickman, Secretary of Agriculture; the Honorable Jacob J. Lew, Director, Office of Management and Budget; and other interested parties. We will make copies available to others on request.

If you have any questions about this report, please contact me at (202) 512-5138. Major contributors to this report are listed in appendix II.

Sincerely yours,

Robert E. Robertson
Associate Director, Food and
Agriculture Issues

Comments From the U.S. Department of Agriculture

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

USDA

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive Alexandria, VA 22302-1500

JAN 21 2000

Mr. Robert E. Robertson
Associate Director
Food and Agriculture Issues
Resources, Community, and Economic Development Division
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Robertson:

Thank you for the opportunity to comment on the General Accounting Office's (GAO) Draft Report, SCHOOL MEAL PROGRAMS: Few Outbreaks of Foodborne Illness Reported (GAO/RCED-00-53). The Food and Nutrition Service (FNS) was asked by the Office of the Inspector General to take the lead in coordinating the Departmental response to the draft report. Therefore, in addition to the comments that FNS is providing, we are also including comments received from the Agricultural Marketing Service (AMS) and the Food Safety and Inspection Service (FSIS). The Farm Service Agency (FSA) had no comments regarding the draft report. This letter provides the Department of Agriculture's (USDA) general comments on the draft report. Technical comments are included in the enclosure; we have provided these comments for GAO's consideration in revising the text of the draft report. It is not necessary for GAO to print the enclosure verbatim as part of USDA's official response.

We are pleased that GAO has concluded that there have been few incidents of foodborne illnesses associated with the school food programs. That finding confirms our belief that there are effective prevention measures in place at the Federal, State, and local levels to ensure the safety of food served to school children. We also appreciate the attention given in the draft report to the preventive efforts made by USDA to ensure that the food that USDA purchases for donation to schools is safe.

Schools, like other members of the food purchasing public, are already protected by food safety regulations implemented by Federal, State, and local agencies (and these measures appear to be very effective, as evidenced by the relatively few incidents of foodborne illness in the school meal programs as noted by GAO). Because these protections are already in place to protect schools' food purchases, we believe that the most significant issues affecting the safety of food served to school children involve food storage, handling, and serving. Therefore, we have focused our efforts and devoted *substantial* resources to providing guidance to schools on safe food handling practices once the food is purchased. Although we appreciate that the GAO auditors recognized our efforts in this area during our telephone conference of January 18, 2000, we are extremely concerned that the draft report fails to mention the substantial efforts that we have devoted to training and providing materials to schools' food service staff in the area of safe food storage, handling, and serving practices. Given that food storage, handling,

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See comment 1.

and serving practices have the most direct impact on the safety of food served in schools, we believe that the report is incomplete without any mention of these issues or the resources that USDA has developed to help school food service professionals in the area of safe food preparation.

The primary resource developed for schools in this area is Serving it Safe: A Manager's Tool Kit, a comprehensive, inter-active training package that was developed by FNS in 1996 to cover food service sanitation and safety. The package was so well regarded that it was adopted by the American School Food Service Association (ASFSA) for use in its own food safety and sanitation training, and has been provided upon request to many restaurants and other members of the food service industry. Using funds provided to FNS under the President's Food Safety Initiative, it was recently updated to incorporate the 1999 Food Code. After an initial distribution to 23,000 school food authorities nationwide, the updated version of Serving it Safe is now available from the National Food Service Management Institute (the Institute). A few of FNS' other recent food safety initiatives include:

- USDA drafted legislation which was promulgated in section 102(c) of Public Law 105-336, of the William F. Goodling Child Nutrition Reauthorization Act of 1998 (42 USC 1758(h)), requiring schools participating in the school lunch program in areas without inspection requirements to obtain a food safety inspection at least once during each school year.

- In fiscal years 1999 and 2000, FNS requested and received an appropriated sum of $2 million to be used for food safety education.

- With a portion of its 1999 food safety education funds, FNS developed an easy to read laminated pocket card with basic reminders of safe food preparation. The cards will be distributed to program operators in schools starting in late January or early February 2000.

- In August 1999, the Institute, under a cooperative agreement with FNS, hosted a national teleconference entitled "Food Safety, It's in Your Hands." A video tape of the teleconference, together with a lesson series on food safety and sanitation and other materials, was distributed in November and December 1999 to 23,000 school food authorities.

- The Institute will host a second teleconference, entitled "Managing Food Safety: The Next Step," on January 26, 2000. This teleconference is the start of a major training and technical assistance effort (funded by a cooperative agreement with FNS) for school food service operators covering Hazard Analysis and Critical Control Point (HACCP) principles for school food service. Companion materials will also be developed as they were for the August 1999 teleconference.

- AMS and FNS are working together to develop a "value-added" database that will provide a nutritional analysis of USDA-purchased commodities when included in popular volume recipes. In order to have products included in the database, producers will have to meet certain food safety standards that go beyond current regulatory requirements.

- FNS is participating in the newly-formed Federal Food Safety Coalition, a group that includes Federal agencies responsible for direct or indirect feeding programs. The group's focus is the prevention of foodborne illness in "at risk" populations, including children, the elderly, and pregnant women. The group will concentrate on encouraging the adoption of the Food Code in Federal programs, and will also work on identifying the key intervention factors that could be addressed in training or educational materials that would most effectively reduce the incidence of foodborne illness.

With respect to the second recommendation in the draft report, we believe that our focus with schools on safe food *preparation*, rather than on food *procurement*, is appropriate. Furthermore, we believe that information on incorporating food safety measures into procurements is already familiar to many of our State and local partners, but we are prepared to take the following actions in an effort to make the information more widely available.

- Utilizing food safety education funds if necessary, we will work with the Institute (which is our major food service training and technical assistance resource) to incorporate additional food safety information into the Institute's procurement training and materials as appropriate.

- We will continue to work with AMS to ensure that AMS' grading services, quality measures, and procurement practices are known to States and school purchasers.

As a general comment from the food safety mission area's perspective, Dr. Catherine Woteki, Under Secretary for Food Safety is responsible for all food safety issues across USDA. Under Secretary Woteki directs and coordinates activities in all instances where there is a food safety concern to ensure that all USDA's resources are deployed to appropriately address the risk or threat. Of specific concern to FSIS as explained at the exit conference is the draft report's discussion of recalls and informing States needs to be clarified for FSIS-regulated foods. In addition to the recalls, which are correctly identified in the draft report as voluntary, FSIS has full authority to detain any products suspected of being contaminated. FSIS has an extensive network of contacts with States and local food service personnel, and notifies AMS and FNS immediately if it learns about safety problems. FSIS believes that the draft report, as written, is misleading in that it does not include this information.

See comment 2.

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Mr. Robert E. Robertson
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Thank you again for giving us an opportunity to comment on the draft report. Please let us know if we may be of assistance to you.

Sincerely,

Samuel Chambers, Jr.

Enclosure

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GAO Comments

1. We do not agree that the report is incomplete because it does not enumerate the U.S. Department of Agriculture's (USDA) efforts to provide guidance to schools regarding safe food storage, handling, and serving practices. While we agree that such practices are important in ensuring the safety of school meals, an evaluation of USDA's actions in this area is beyond the scope of work that we were requested to conduct. Therefore, we did not highlight these actions in the report. Rather, our report addresses the requester's concerns regarding procurement policies and procedures to ensure the safety of foods served in the federally supported school meal programs.

2. We revised the report to include USDA's authority to detain products.

GAO Contacts and Staff Acknowledgements

GAO Contacts

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Acknowledgements

In addition to those named above, Leo Acosta, Kathy Colgrove-Stone, Brad Dobbins, Oliver Easterwood, and Jonathan Silverman made key contributions to this report.

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